

## **EXHIBIT 2**

**REDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING,  
INC.,

Defendants.

/

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

WAYMO LLC RULE 30(b)(6)

VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ

PALO ALTO, CALIFORNIA

THURSDAY, AUGUST 3, 2017

REPORTED BY:

ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2663199

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1 [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:31

4 MR. KIM: Okay. 17:31

5 Q And so that's one secret that's disclosed by 17:31  
6 the files of which Exhibit 1286 is a printout; 17:31  
7 correct? 17:31

8 MR. JAFFE: Object to form. 17:31

9 THE WITNESS: The -- I mean, that's one thing 17:31  
10 you want to keep secret. So, like, the -- that's -- 17:31  
11 yeah. Go ahead. 17:31

12 MR. KIM: Okay. 17:31

13 Q And what's something else that's disclosed in 17:31  
14 the files that you would want to keep secret? 17:31

15 MR. JAFFE: Object to form. 17:31

16 THE WITNESS: Okay. So I can -- another 17:31  
17 example of something I want to keep secret, the -- you 17:31  
18 know, the specific -- like, for example, I think one 17:32  
19 example, [REDACTED] [REDACTED] 17:32

[REDACTED] [REDACTED] 17:32

21 MR. KIM: Q. Where is that? 17:32

22 A That would be, like, the -- you know, those 17:32  
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] is one example 17:32

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1 of something we want to keep secret. 17:32

2 Q Okay. 17:32

3 A It took us a while to figure out which one is 17:32

4 the right one, and so -- 17:32

5 Q What else? 17:32

6 A So another example, you know, there is -- you 17:32

7 know, [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

19 And so that -- that's something to keep 17:33

20 secret. Those are examples. There are others. 17:33

21 MR. KIM: Q. What else? 17:33

22 A The -- I think, you know, another example is 17:33

23 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

The image consists of a grid of black bars of varying lengths. The bars are arranged in rows and columns. Some rows have a single long bar, while others have multiple shorter bars. The pattern repeats across the grid, suggesting a systematic redaction of data. The bars are solid black and have thin white borders.

1 CERTIFICATE OF REPORTER  
2

3 I, ANDREA M. IGNACIO, hereby certify that the  
4 witness in the foregoing deposition was by me duly  
5 sworn to tell the truth, the whole truth, and nothing  
but the truth in the within-entitled cause;

6 That said deposition was taken in shorthand  
7 by me, a disinterested person, at the time and place  
8 therein stated, and that the testimony of the said  
9 witness was thereafter reduced to typewriting, by  
computer, under my direction and supervision;

10 That before completion of the deposition,  
11 review of the transcript [x] was [ ] was not  
12 requested. If requested, any changes made by the  
13 deponent (and provided to the reporter) during the  
period allowed are appended hereto.

14 I further certify that I am not of counsel or  
15 attorney for either or any of the parties to the said  
16 deposition, nor in any way interested in the event of  
this cause, and that I am not related to any of the  
17 parties thereto.

18 Dated: August 4, 2017  
19  
20  
21



24 ANDREA M. IGNACIO,  
25 RPR, CRR, CCRR, CLR, CSR No. 9830